

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

---

Brenda Ann Smith,

Case No. 21-cv-1347 (PAM/BRT)

Plaintiff,

v.

City of Minneapolis, a municipal entity;  
Officer Does, in their individual capacity,

**JOINT STIPULATION FOR  
AMENDED SCHEDULING ORDER**

Defendants.

---

Plaintiff Brenda Ann Smith (“Plaintiff”) and Defendants City of Minneapolis and Officer Does (“Defendants”) (collectively, the “Parties”), by and through their respective counsel, hereby submit the following proposed amendments to the Court’s Pre-Trial Scheduling Order (ECF Doc. 37 (“First Pretrial Scheduling Order”)).

The parties submit that there is good cause for the modifications due to the time required for Plaintiff to review voluminous video footage from the location and time where she alleges that she was struck by a 40mm projectile. Plaintiff requested the video footage in discovery on February 23 and Defendant provided the video on April 28. There were 68 videos of varying length covering a two-hour time period. Plaintiff needs time to carefully review all video provided to attempt to identify the John Doe officer who struck her, or to make further discovery requests. The proposed modification extends the below deadlines contained in the original Pretrial Scheduling Order by 45 days. The deadlines for expert disclosures, dispositive motions, and trial are unchanged.

Accordingly, the parties jointly request that the First Pretrial Scheduling Order be modified as set out below:

**PROPOSED AMENDED SCHEDULE**

<b>Event</b>	<b>Current Date</b>	<b>New Date</b>
Commence Fact Discovery In Time to be Completed By	October 31, 2022	December 15, 2022
Document Discovery Substantial Completion	July 29, 2022	September 12, 2022
Rule 30(b)(6) deposition notices served	July 29, 2022	September 12, 2022
Rule 35 Medical Exam	September 30, 2022	November 14, 2022
Meet and Confer re: Experts and Fields	August 31, 2022	October 14, 2022
Motions to Join Other Parties	May 31, 2022	July 15, 2022
Motions to Amend the Pleadings	June 30, 2022	August 15, 2022
Non-Dispositive Motions (Fact Discovery)	October 31, 2022	December 15, 2022
Settlement Conference	June 6, 2022	A date after July 15, 2022

Dated: May 30, 2022

PETER W. GINDER  
Acting City Attorney

BY: /s/Heather Robertson  
HEATHER P. ROBERTSON (0390470)  
KRISTIN R. SARFF (0388003)  
SHARDA ENSLIN (0389370)  
Assistant City Attorneys  
Minneapolis City Attorney's Office  
350 South Fifth Street, Room 210  
Minneapolis, MN 55415  
(612) 673-3949  
heather.robertson@minneapolismn.gov  
kristin.sarff@minneapolismn.gov  
shard.enslin@minneapolismn.gov

*Attorneys for Defendants*

Dated: May 30, 2022

/s/ Nico Ratkowski  
NICO RATKOWSKI (0400413)  
Contreras & Metelska, P.A.  
200 University Avenue W., STE 200  
Saint Paul, MN 55103  
(651) 771-0019  
nico@contrerasmetelska.com

*Attorney for Plaintiff*